

# EXHIBIT 18

SUPERIOR COURT OF THE STATE OF CALIFORNIA

FOR THE COUNTY OF LOS ANGELES

DEPARTMENT NO. 2

HON. GLORIA WHITE-BROWN, JUDGE

COORDINATED PROCEEDING	)	J.C.C.P. NO. 4674
SPECIAL TITLE (RULE 3.550)	)	
	)	
LAOSD ASBESTOS CASES	)	
	)	
	)	
	)	
JOANNE ANDERSON AND GARY ANDERSON,	)	NO. BC666513
	)	
PLAINTIFFS,	)	
	)	PAGES 1786-1887
VS.	)	
	)	
BORG-WARNER CORPORATION BY ITS	)	
SUCCESSOR-IN-INTEREST BORG-WARNER MORSE	)	
TEC, INC., ET AL.,	)	
	)	
DEFENDANTS.	)	
	)	

**Certified Transcript**

REPORTER'S DAILY TRANSCRIPT OF PROCEEDINGS

MAY 15, 2018; P.M. SESSION

**APPEARANCES:** (SEE FOLLOWING PAGE)

GAYE L. LIMON, CSR #7416  
OFFICIAL REPORTER PRO TEMPORE

2 (Pages 1786 to 1787)

	Page 1786
<p>1 FOR THE PLAINTIFFS: SIMON GREENSTONE PANATIER BARTLETT 2 BY: DAVID C. GREENSTONE, ESQ. 3 CHRIS PANATIER, ESQ. 4 CONOR NIDEFFER, ESQ. 5 3780 KILROY AIRPORT 6 SUITE 540 7 LONG BEACH, CALIFORNIA 90806 8 9 FOR THE DEFENDANTS BAILEY CROWE KUGLER &amp; ARNOLD, LLP 10 JOHNSON &amp; JOHNSON AND BY: MEL D. BAILEY, ESQ. 11 JCJ: CORI STEINMANN, ESQ. 12 6550 BANK OF AMERICA PLAZA 13 901 MAIN STREET 14 DALLAS, TEXAS 75202 15 -AND- 16 KING &amp; SPALDING 17 BY: ALEXANDER G. CALFO, ESQ. 18 633 WEST FIFTH STREET 19 SUITE 1700 20 LOS ANGELES, CALIFORNIA 90071 21 22 23 24 25 26 27 28</p>	<p>1 CASE NUMBER: BC666513 2 CASE NAME: JOANNE ANDERSON, GARY ANDERSON V. 3 BORG-WARNER CORPORATION, 4 ETC., ET AL. 5 WEST COVINA, CALIFORNIA MAY 15, 2018 6 DEPARTMENT 2 HON. GLORIA WHITE-BROWN, JUDGE 7 REPORTER: GAYE L. LIMON, CSR #7416 8 TIME: 1:47 P.M. 9 APPEARANCES: 10 THE DEFENDANT REPRESENTED IN COURT BY COUNSEL, 11 ALEXANDER G. CALFO, ESQ., AND MEL D. BAILEY, 12 ESQ., CORI STEINMANN, ESQ.; DAVID C. GREENSTONE, 13 ESQ., CHRIS PANATIER, ESQ., AND CONOR NIDEFFER, 14 ESQ., REPRESENTING THE PLAINTIFFS. 15 16 -000- 17 18 (THE FOLLOWING PROCEEDINGS WERE HELD 19 IN THE PRESENCE OF THE JURY:) 20 21 THE COURT: EVERYONE MAY BE SEATED. WE ARE BACK ON THE 22 RECORD IN THE ANDERSON V. JOHNSON &amp; JOHNSON, ET AL. ALL 23 PARTIES ARE IN THEIR RESPECTIVE PLACES. JURORS AND ALTERNATE 24 JURORS ARE PRESENT. 25 MR. PANATIER, YOU MAY PROCEED WITH YOUR DIRECT 26 EXAMINATION. 27 28</p>
<p>1 2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23 24 25 26 27 28</p>	Page 1787
<p>1 2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23 24 25 26 27 28</p>	<p>1 2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23 24 25 26 27 28</p>

15 (Pages 1836 to 1839)

Page 1836	Page 1838
<p>1 A YES. SOMEBODY WHO IS USING ASBESTOS PRODUCTS AS 2 A JOB, TYPICALLY, THEIR WORK CLOTHES WILL BECOME 3 CONTAMINATED; AND THOSE WORK CLOTHES, IF CONTAMINATED AND IN 4 THE LAUNDRY, THE PERSON DOING THAT CAN HAVE A SUBSTANTIAL 5 EXPOSURE, YES, SIR. 6 Q I DON'T REMEMBER HER DEPOSITION, BUT IN THIS 7 COURT, BOTH MR. ANDERSON AND MRS. ANDERSON SAID THAT 8 MR. ANDERSON'S CLOTHES WOULD BE FILTHY IN DOING THIS BRAKE 9 WORK AND THAT SHE WOULD THEN HAVE TO SHAKE IT OUT BEFORE SHE 10 COULD PUT IT IN THE LAUNDRY. 11 Q DID YOU HAVE ANY INFORMATION ABOUT THAT? 12 A NO. BUT IF, IN FACT, THAT CLOTHING IS 13 CONTAMINATED FROM THAT BRAKE JOB, YES, SHE WOULD HAVE AN 14 EXPOSURE. 15 Q EVERY TIME -- AND YOU'VE MEASURED THESE 16 EXPOSURES; RIGHT? 17 A YES, SIR. 18 Q AND HOW HIGH ARE THEY? 19 A FOR ONE COMPRESSED AIR BLOWOUT OR ONE SANDING OF 20 BRAKE SHOES IN THE -- YOU KNOW, POINT-SOMETHING FIBERS PER 21 CC. 22 Q I AM TALKING ABOUT LAUNDRY SHAKEOUTS WHERE 23 SOMEBODY COMES HOME WITH CLOTHING FULL OF ASBESTOS WORKING 24 WITH ASBESTOS PRODUCTS AND THEIR SPOUSE SHAKES IT OUT. HAVE 25 YOU DONE TESTING TO SUPPORT THOSE KIND OF CLAIMS AND 26 LITIGATION? 27 A WE'VE DONE TESTING FOR CUTTING OF 28 ASBESTOS-CONTAINING CEMENT PIPE, BUT WE'VE ALSO DONE TESTING</p>	<p>1 Q I'M TALKING ABOUT BRAKE WORKERS. YOU'VE 2 TALKED -- YOU'VE TESTIFIED IN CASES WHERE THERE ARE BRAKE 3 WORKERS, AND THAT'S THEIR ONLY KNOWN EXPOSURE TO ASBESTOS; 4 RIGHT? 5 A YES, SIR. CAREER BRAKE MECHANICS. 6 Q YOU'VE TESTIFIED IN CASES WHERE PEOPLE'S ONLY 7 KNOWN EXPOSURE TO ASBESTOS IS SHAKEOUT LAUNDRY; RIGHT? 8 A YES, SIR. 9 Q AND IN THOSE CASES WHERE THERE'S A LAWSUIT -- YOU 10 WERE ASKED TO COME IN AND TESTIFY THAT THE PERSON MAKING THE 11 CLAIM HAD A SUBSTANTIAL EXPOSURE FROM SHAKEOUT LAUNDRY; 12 RIGHT? 13 A YES, SIR. 14 Q SO WE TALKED ABOUT DOING THIS PIPE-COVER TESTING. 15 HOW MUCH DID YOU MAKE PER TEST WHEN PLAINTIFFS' ATTORNEYS 16 WERE HIRING YOU TO DO THESE WORK PRACTICE STUDIES? 17 A WE -- THE COMPANY CHARGES ANYWHERE FROM 15- TO 18 \$25,000, SOME AS HIGH AS 30- OR \$40,000 PER STUDY, IF EITHER 19 PLAINTIFFS OR DEFENDANTS HIRE US TO DO THESE STUDIES. 20 MR. BAILEY: CORI, COULD YOU PUT UP SLIDE 2, PLEASE. 21 Q DO YOU SEE THAT? BENDIX BRAKES WORK SIMULATION 22 DEMONSTRATION. THAT'S THE WORK PRACTICE YOU WERE TALKING TO 23 ME ABOUT EARLIER; RIGHT? 24 A THAT'S ONE OF THESE. 25 Q THIS IS A STUDY FOR BENDIX BRAKES FOR FORD 26 VEHICLES WHERE AN ATTORNEY REPRESENTING A PLAINTIFF ASKED YOU 27 TO CONDUCT A STUDY OF THOSE PRODUCTS; RIGHT? 28 A THAT IS CORRECT.</p>
<p style="text-align: center;">Page 1837</p> <p>1 WHERE IT IS A VERY -- IT IS A BRAKE JOB WHERE IT IS ONE 2 COMPRESSED BLOWOUT OR IT IS ONE SANDING, AND THOSE LEVELS ARE 3 AROUND THE .1 FIBER PER CC RANGE. 4 Q I MUST NOT BE MAKING MY QUESTION CLEAR. LAUNDRY 5 THERE ON THE LIST -- MY QUESTION IS YOU HAVE STUDIED, HAVEN'T 6 YOU, HOW MUCH ASBESTOS DUST IS EMITTED BY SHAKEOUT LAUNDRY 7 WHEN IT HAS BEEN INTRODUCED TO ASBESTOS DUST FROM USING SOME 8 OF THESE PRODUCTS YOU ARE TESTING? RIGHT? 9 A YES, SIR. I'M TALKING ABOUT BRAKE JOBS, LAUNDRY 10 WITH WORK CLOTHES ON A BRAKE JOB SIMILAR TO WHAT HAS BEEN 11 TESTIFIED HERE. THOSE RANGES ARE .1 FIBERS PER CC. 12 Q WELL ABOVE BACKGROUND, ACCORDING TO WHAT YOU GAVE 13 US EARLIER; RIGHT? 14 A YES, IT IS. 15 Q SUBSTANTIALLY ABOVE BACKGROUND. TRUE? 16 A THAT'S TRUE. 17 Q YOU KNEW, IF YOU READ HER DEPOSITION, THAT SHE 18 DID THAT WORK FOR DECADES; CORRECT? 19 A THE BRAKE JOBS? 20 Q SHAKEOUT LAUNDRY. 21 A I GUESS OVER THE TIME THE 17 OR 18 BRAKE JOBS AND 22 CLUTCHES, YES, SIR. 23 Q YOU TESTIFIED IN CASES, HAVEN'T YOU, DR. LONGO, 24 WHERE, NOT ONLY WAS THE ONLY EXPOSURE TO ASBESTOS THROUGH 25 BRAKES BUT THAT THERE WERE FEWER BRAKES JOBS THAN 26 MR. ANDERSON'S TALKING ABOUT HERE, HAVEN'T YOU? 27 A NO. I DON'T THINK SO. CERTAINLY NOTHING WITH 28 LAUNDRY.</p>	<p style="text-align: center;">Page 1839</p> <p>1 Q WHEN DID YOU DO THAT WORK? DO YOU RECALL? 2 A I'M LOOKING AT THE ADDRESS. NORCROSS, GEORGIA. 3 THAT WOULD -- THAT WAS THE FIRST BUILDING WE WERE IN. SO 4 THAT HAD TO BE PRE-1999. 5 Q I AM JUST TRYING TO GET SOME SORT OF FEEL OF WHAT 6 YOU WERE DOING DURING DIFFERENT -- SAY, FIVE- OR TEN-YEAR 7 PERIODS. 8 YOU TOLD US EARLY ON YOU WERE DOING TESTS OF PIPE 9 COVERING. WHEN DID YOU START DOING THESE BRAKE TESTS? 10 A I THINK THAT WAS 1998 OR 1999. 11 Q TIME FLIES. ALMOST 20 YEARS AGO; RIGHT? 12 A I KNOW. YOU HAVEN'T AGED BUT I HAVE. 13 MR. BAILEY: SLIDE 3, PLEASE. 14 Q NOW, HERE FEL-PRO AUTOMOTIVE GASKETS. YOU'VE 15 TESTED FEL-PRO AUTOMOTIVE GASKETS TO SEE IF THEY HAVE 16 ASBESTOS; CORRECT? 17 A THAT IS CORRECT. 18 Q AND YOU KNOW BECAUSE YOU READ THE TESTIMONY IN 19 THIS CASE THAT MR. AND MRS. ANDERSON CLAIM TO HAVE BEEN -- TO 20 HAVE USED FEL-PRO AUTOMOTIVE GASKETS; RIGHT? 21 A THAT IS CORRECT. 22 Q YOU'VE TESTED THESE FOR ASBESTOS CONTENT; RIGHT? 23 A YES. 24 Q AND YOU TESTED THIS IN A LAWSUIT WHERE 25 PLAINTIFFS' ATTORNEY ASKED YOU TO DO THAT BECAUSE THEY WERE 26 MAKING A CLAIM AGAINST THE MANUFACTURER OF FEL-PRO AUTOMOTIVE 27 GASKETS; CORRECT? 28 A I BELIEVE SO.</p>

16 (Pages 1840 to 1843)

<p style="text-align: right;">Page 1840</p> <p>1 Q AND WHAT WOULD THE CHARGE FOR THAT TEST HAVE 2 BEEN? 3 A THAT, I DON'T RECALL. PROBABLY BACK THEN MAYBE 4 \$15,000 MY COMPANY WOULD HAVE CHARGED FOR. 5 Q HOW MANY OF THESE WORK PRACTICE STUDIES HAVE YOU 6 DONE IN YOUR CAREER? 7 A WHERE ONE SIDE OR THE OTHER, PLAINTIFFS OR 8 DEFENDANTS, HAVE COMMISSIONED US, PROBABLY 50. 9 Q ALWAYS SOMEWHERE BETWEEN 15,000. AND I THINK YOU 10 SAID ON THE HIGH END 40,000 A MINUTE AGO? 11 A I WOULD SAY THE MAJORITY ARE 15,000. 12 MR. BAILEY: SLIDE 4, PLEASE, CORI. 13 Q YOU'VE ALSO TESTED SANDING CLUTCH PLATES FOR 14 BORG-WARNER; CORRECT? 15 A YES, SIR. 16 Q THIS WOULD BE IN CASES – AND YOU'VE TESTIFIED 17 ABOUT THE RESULTS OF THIS IN TRIAL; RIGHT? 18 A I DON'T THINK I EVER HAVE. 19 Q THIS WAS BROUGHT IN A CASE WHERE YOU WERE OFFERED 20 AS AN EXPERT WITNESS, I TAKE IT, TO TESTIFY ABOUT THE RESULTS 21 OF YOUR WORK; RIGHT? 22 A CORRECT. BUT I DON'T THINK I'VE EVER TESTIFIED 23 IN COURT ABOUT THESE RESULTS. 24 Q OKAY. YOU DID THE WORK, AND THE PURPOSE OF THE 25 WORK WAS TO SEE WHETHER OR NOT ASBESTOS WAS GENERATED IN 26 WORKING WITH THESE BORG-WARNER CLUTCH BRAKES -- CLUTCH 27 PLATES; CORRECT? 28 A YES, SIR.</p>	<p style="text-align: right;">Page 1842</p> <p>1 TALCUM POWDER UNTIL 2017 OR THEREABOUT; RIGHT? 2 A THAT'S CORRECT. 3 Q SO YOU'D BEEN HEAVILY INVOLVED IN LITIGATION FROM 4 1990 UP UNTIL 2017 BEFORE ANY OF THESE PLAINTIFFS' LAWYERS 5 THAT YOU HAD WORKED FOR ALL THESE YEARS EVER ASKED YOU TO DO 6 ANY TYPE OF TESTING ON TALCUM POWDER. THAT'S TRUE, ISN'T IT? 7 A NO. 8 Q WHEN DID YOU FIRST GET CONTACTED BY MARK LANIER? 9 A THAT'S DIFFERENT. I'VE BEEN CONTACTED OVER THE 10 YEARS ABOUT TESTIFYING AND WORKING IN THIS AREA AND HAVE 11 TURNED IT DOWN. IN 2016 IT WAS EITHER MARK LANIER OR JOE 12 SATTERELY. 13 Q PRIOR TO THAT YOU'D NEVER TESTED A TALCUM POWDER 14 AT ALL FOR ANY REASON; RIGHT? 15 A THAT'S CORRECT. 16 Q LET ME ASK JUST A COUPLE QUESTIONS OTHER THAN 17 YOUR NAME HERE, AND THAT IS, WHO YOU ARE AND WHAT YOU DO. 18 YOU TOLD US YOU'RE NOT AN INDUSTRIAL HYGIENIST; 19 CORRECT? 20 A I'M NOT A CERTIFIED INDUSTRIAL HYGIENIST. 21 Q WHAT INDUSTRIAL HYGIENISTS DO, THEY GO INTO 22 WORKPLACES OR PLACES WHERE THERE IS AN OPPORTUNITY FOR 23 EXPOSURE TO SOMETHING AND TAKE MEASUREMENTS. THAT'S THE 24 FIRST PART OF BEING AN INDUSTRIAL HYGIENIST; CORRECT? 25 A THAT'S ONE OF THE THINGS THEY CAN DO, YES. 26 Q AND THEY SOMETIMES MAKE EVALUATIONS AS TO WHAT 27 THEIR EXPOSURE LEVELS ARE AND WHETHER OR NOT THEY CARRY ANY 28 RISK WITH THEM. TRUE?</p>
<p style="text-align: right;">Page 1841</p> <p>1 Q AND YOU READ THE DEPOSITION, I GUESS, OF THE 2 PLAINTIFFS. THEY IDENTIFIED THE CLUTCHES THEY WERE USING AS 3 BORG-WARNER; RIGHT? 4 A CORRECT. BUT NOT SANDING. JUST TAKING THEM OUT. 5 Q IN COURT BOTH MR. AND MRS. ANDERSON TALKED ABOUT 6 HOW IT IS THEY WENT ABOUT TAKING THESE CLUTCHES OFF. YOU 7 HADN'T BEEN PROVIDED WITH ANY TESTIMONY FROM THE COURTROOM, 8 HAVE YOU? 9 A NOT CONCERNING THE CLUTCHES, NO. 10 Q OKAY. NOW, FOR BRAKES, FOR CLUTCHES, FOR 11 GASKETS, MRS. ANDERSON ALSO TOLD US THAT SHE WOULD HAVE THE 12 RESPONSIBILITY OF SWEEPING UP THE DEBRIS AND THE DUST THAT 13 FELL UNDERNEATH THE CAR. DID YOU SEE THAT IN HER DEPOSITION? 14 A YES, SIR. 15 Q NOW, YOU'VE ALSO BEEN PAID BY PLAINTIFFS' 16 ATTORNEYS TO STUDY HOW MUCH ASBESTOS DUST IS CREATED IN 17 SWEEPING UP AFTER ASBESTOS PRODUCTS ARE USED; RIGHT? 18 A IN SOME CASES, YES. 19 Q YOU RECOGNIZE AND ALWAYS HAVE THAT THE SWEEPING 20 UP OF ASBESTOS DEBRIS AND DUST CREATES ANOTHER OPPORTUNITY 21 FOR SUBSTANTIAL EXPOSURE TO ASBESTOS; RIGHT? 22 A THAT IS CORRECT. 23 Q AND YOU'VE TESTIFIED ABOUT THAT IN A NUMBER OF 24 COURTROOMS, HAVEN'T YOU? 25 A YES, SIR. 26 Q SO WE WENT THROUGH WHEN IT IS YOU WERE TESTING 27 PIPE COVERING, WHEN IT IS YOU WERE TESTING BRAKES. IT'S 28 TRUE, ISN'T IT, THAT NO ONE ASKED YOU TO INVESTIGATE OR TEST</p>	<p style="text-align: right;">Page 1843</p> <p>1 A THAT'S PART OF IT, YES. 2 Q ALL RIGHT. YOU'RE NOT A STATISTICIAN; CORRECT? 3 A THAT IS CORRECT. 4 Q YOU'RE NOT AN EPIDEMIOLOGIST; CORRECT? 5 A THAT'S RIGHT. 6 Q THE JURY'S HEARD ABOUT EPIDEMIOLOGY. THAT'S NOT 7 SOMETHING YOU ARE INVOLVED IN, IS IT? 8 A NO, SIR, IT IS NOT. 9 Q YOU'RE NOT A GEOLOGIST; RIGHT? 10 A I AM NOT. 11 Q BY THAT, WHEN WE TALK ABOUT GEOLOGY IN THE MINES 12 AND THINGS OF THAT NATURE, THAT'S AN AREA THAT YOU DON'T HAVE 13 ANY FORMAL TRAINING IN; CORRECT? 14 A I'M NOT A GEOLOGIST. 15 Q NOR DO YOU HAVE ANY INTENTION OF TESTIFYING ABOUT 16 ANYTHING THAT IS DRIVEN BY GEOLOGY AS AN EDUCATION OR 17 TRAINING; RIGHT? 18 A NO, SIR. HOW THE MINES WERE FORMED, WHY THEY 19 HAVE ACCESSORY MINERALS WITH ASBESTOS, AND THE METAMORPHOSE 20 AND HOW IT CHANGES OVER TIME AND THE DIFFERENT SITUATION -- 21 THAT'S NOT SOMETHING I TESTIFY ABOUT. 22 Q WHERE MINERALS ARE, WHERE THEY ARE NOT, WHY 23 THEY'RE THERE, WHY THEY'RE FORMED, OR WHY THEY'RE NOT -- 24 THAT'S A QUESTION FOR GEOLOGISTS AND MINERALOGISTS; RIGHT? 25 A THAT'S A PRETTY BROAD AREA. I DON'T TALK ABOUT 26 HOW THE MINES ARE FORMED. I TALK ABOUT ACCESSORY MINERALS. 27 THAT'S SOMETHING WE DO AND ANALYZE ALL THE TIME. THE 28 MINERALOGY ON THE IDENTIFICATION OF ASBESTOS, OF COURSE, I</p>

17 (Pages 1844 to 1847)

Page 1844	Page 1846
<p>1 HAVE LOTS OF TRAINING IN THAT. 2 BUT MY PRIMARY FUNCTION WAS TO LOOK AT THESE TALC 3 SAMPLES, TALCUM POWDER SAMPLES, IN USING MATERIAL SCIENCE 4 SKILLS LIKE ELECTRON MICROSCOPY SKILLS, WAS THERE ASBESTOS 5 THERE OR NOT? THAT'S WHAT WE DO. 6 Q AND AS FAR AS QUESTIONS THAT ARE RAISED BEYOND 7 THAT WOULD REQUIRE A GEOLOGIST TO OFFER AN EDUCATED AND 8 TRAINED OPINION, YOU'RE NOT A GEOLOGIST? 9 A I DON'T HAVE A DEGREE IN GEOLOGY. 10 THE COURT: IS THIS A GOOD TIME TO TAKE A BREAK? 11 MR. BAILEY: IT IS, YOUR HONOR. 12 THE COURT: WE ARE GOING TO TAKE A RECESS AT THIS 13 POINT. REMEMBER THE ADMONITION NOT TO FORM OR EXPRESS AN 14 OPINION. WE ARE GOING TO RETURN AT 3:25. THAT GIVES YOU 15 ABOUT 12 MINUTES. AND THEN WE WILL CONTINUE WITH THE 16 TESTIMONY. PLEASE RETURN IN 12 MINUTES. 17 18 (RECESS). 19 20 (THE FOLLOWING PROCEEDINGS WERE HELD 21 IN THE PRESENCE OF THE JURY:) 22 23 THE COURT: EVERYONE BE SEATED. BACK ON THE RECORD IN 24 THE ANDERSON V. JOHNSON &amp; JOHNSON, ET AL. 25 AND, MR. BAILEY, YOU MAY PROCEED WITH YOUR 26 CROSS-EXAMINATION. 27 MR. BAILEY: THANK YOU, YOUR HONOR. 28 Q DR. LONGO, WE'VE HEARD EVIDENCE IN THIS CASE</p>	<p>1 PLASTERERS AND FIREPROOFING AND DETERMINE WHO MADE IT. 2 THAT'S PROBABLY THE MAJORITY OF THE WORK I WAS DOING IN THE 3 1990s. 4 Q YOU WERE GOING INTO BUILDINGS BUILT IN THE '50s 5 AND '60s THAT WERE FULL OF ASBESTOS; RIGHT? 6 A NO. WE WERE THE LAB WHERE CONSULTANTS WHO WERE 7 TAKING SAMPLES UNDER A HIRE AND SENDING THEM TO FIREPROOFING 8 ACOUSTICAL PLASTERERS AND WOULD ESSENTIALLY REVERSE ENGINEER 9 THEM ALL THE WAY BACK TO THE MANUFACTURER WHO MADE THEM. 10 Q YOU WERE TRYING TO IDENTIFY THE NAME OF THE 11 MANUFACTURER THAT MADE IT, THAT MADE THE PRODUCTS THAT WERE 12 USED IN THESE BUILDINGS; CORRECT? 13 A THAT IS CORRECT. 14 Q THESE BUILDINGS WERE BUILT, LIKE MRS. ANDERSON'S 15 HOME, IN THE '50s AND THE '60s MANY TIMES, WEREN'T THEY? 16 A NO. THESE WERE BIG SCHOOLS. THESE WERE STATE 17 BUILDINGS. THERE WAS NO RESIDENTIAL HOMES. THERE'S NO 18 PRODUCT IDENTIFICATION IN RESIDENTIAL HOMES BECAUSE THERE'S 19 ONLY A COUPLE DIFFERENT ASBESTOS PRODUCTS EVER USED IN THESE 20 HOMES. 21 Q THAT WAS A BAD QUESTION. 22 MANY OF THE BUILDINGS THAT YOU WERE LOOKING AT OR 23 THAT WERE BEING INVESTIGATED WERE BUILT IN THE '50s AND THE 24 '60s. THAT'S TRUE, ISN'T? 25 A MID '50s, '60s, '70s, YES. 26 Q SOMEBODY WAS GOING IN TO TEST TO SEE IF THERE WAS 27 ASBESTOS, TAKING IT TO YOU, AND YOU WERE TRYING TO IDENTIFY 28 WHO MADE THE PRODUCT; CORRECT?</p>
<p style="text-align: center;">Page 1845</p> <p>1 THROUGHOUT ABOUT PEOPLE WHO HAVE PUBLISHED ARTICLES IN THE 2 PEER-REVIEW LITERATURE. YOU'RE FAMILIAR WITH THAT PROCESS; 3 CORRECT? 4 A I AM. 5 Q YOU'VE NEVER PUBLISHED ANY PAPERS ON TALC, HAVE 6 YOU? 7 A I HAVE NOT. 8 Q YOU'VE NEVER BEEN TO A TALC MINE, HAVE YOU? 9 A I HAVE NOT. 10 Q YOU'VE NEVER TESTED COSMETIC TALC OUTSIDE OF 11 LITIGATION; CORRECT? 12 A THAT IS CORRECT. 13 Q YOU'VE NEVER TESTED COSMETIC TALC WHEN YOU 14 WEREN'T BEING PAID TO DO IT BY PLAINTIFFS' COUNSEL. TRUE? 15 A THAT'S TRUE. WE FIRST STARTED TESTING COSMETIC 16 TALC WHEN WE WERE CONTACTED BY PLAINTIFFS' FIRMS TO DO THAT. 17 Q IN ALL THE WORK THAT YOU'VE DONE ON BRAKES, ON 18 PIPE COVERING, ON BOILERS, ON JOINT COMPOUND, THAT TOOK A 19 SUBSTANTIAL PERCENTAGE OF YOUR TIME 10 OR 20 YEARS AGO, 20 DIDN'T IT? 21 A ABOUT 30, 35% OF MY TIME I SPENT ON THAT TYPE OF 22 RESEARCH. 23 Q AND IN THE 1990s, THE VAST MAJORITY OF THE 24 CASES YOU WERE TESTIFYING ABOUT WERE PIPE COVERING, 25 BOILERMAKERS, BOILERS, THINGS OF THAT NATURE. TRUE? 26 A NO. THE VAST MAJORITY WHAT WE WERE DOING WAS 27 PROPERTY DAMAGE CASES WHERE WE WERE HIRED BY ALL THESE CITIES 28 AND STATES TO ANALYZE THE ASBESTOS-CONTAINING ACOUSTICAL</p>	<p style="text-align: center;">Page 1847</p> <p>1 A CORRECT. BUILDINGS LIKE THIS -- LIKE THIS 2 CEILING OR FIREPROOFING OR 50-, 60-, 70-STORY BUILDINGS OR 3 SCHOOL SYSTEMS, ONE AFTER ANOTHER, YES, SIR. 4 Q WHERE YOU KNEW, BECAUSE OF CONSTRUCTION IN THE 5 '50s, THERE WAS ASBESTOS ALL OVER THE BUILDINGS? 6 A NO. WE KNEW WHAT WAS IN THERE BECAUSE SOMEBODY 7 WENT IN AND TOOK ASBESTOS-CONTAINING FIREPROOFING, WHICH 8 STARTED IN THE MID '50s BECAUSE OF CODES; AND SO YOU COULD 9 HAVE A TWO-HOUR OR THREE-HOUR WINDOW IN THE BUILDING OR 10 ACOUSTICAL PLASTERS WHERE -- LIKE THIS WHERE YOU DON'T WANT 11 SOUND BOUNCING AROUND. 12 MR. BAILEY: I OBJECT AS NONRESPONSIVE. 13 THE COURT: SUSTAINED. 14 Q BY MR. BAILEY: YOU ARE WELL AWARE AND DON'T 15 DISPUTE THAT, IN THE '50s AND '60s, WHAT WE ALL KNOW IS 16 THAT HOUSES WERE FULL OF ASBESTOS. THAT'S A FACT. 17 A NO, IT IS NOT. 18 Q OKAY. HOW MANY CASES DO YOU THINK YOU'VE 19 TESTIFIED OVER THE LAST TEN YEARS WHERE THE PRIMARY EXPOSURE 20 YOU WERE THERE TO TESTIFY ABOUT WAS ASBESTOS INSTALLED IN A 21 HOME? 22 A VERY FEW FROM WHEN IT WAS -- THE HOME WAS 23 SOMEBODY BOUGHT IT. I WOULD SAY THE MAJORITY OF IT IS WHEN, 24 DURING THE CONSTRUCTION STARTING IN THE LATE '50s AND OF 25 ALL THE RESIDENTIAL HOMES, THIS WOULD BE NEW CONSTRUCTION 26 WITH ASBESTOS-CONTAINING JOINT COMPOUND. THAT IS THE PRIMARY 27 RESIDENTIAL HOME ASBESTOS BUT ONLY DURING CONSTRUCTION WHERE 28 SOMEBODY WHO'S GOING IN AND DOING MAJOR REMODELING.</p>

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2 FOR THE COUNTY OF LOS ANGELES  
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5 COORDINATED PROCEEDING ) J.C.C.P. NO. 4674  
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LAOSD ASBESTOS CASES )  
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JOANNE ANDERSON AND GARY ANDERSON, ) NO. BC666513  
9 )  
PLAINTIFFS, )  
10 ) REPORTER'S  
VS. ) CERTIFICATE  
11 )  
BORG-WARNER CORPORATION BY ITS )  
12 SUCCESSOR-IN-INTEREST BORG-WARNER MORSE )  
TEC, INC., ET AL., )  
13 )  
DEFENDANTS. )  
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16  
17 I, GAYE L. LIMON, CSR #7416, OFFICIAL REPORTER PRO  
18 TEMPORE OF THE SUPERIOR COURT OF THE STATE OF CALIFORNIA, FOR  
19 THE COUNTY OF LOS ANGELES, DO HEREBY CERTIFY THAT THE  
20 FOREGOING PAGES, 1786 THROUGH 1887, COMPRIZE A FULL, TRUE,  
21 AND CORRECT TRANSCRIPT OF THE PROCEEDINGS AND TESTIMONY TAKEN  
22 IN THE MATTER OF THE ABOVE-ENTITLED CAUSE ON MAY 15, 2018.  
23 THIS TRANSCRIPT WAS PREPARED IN COMPLIANCE WITH  
24 237(A)(2) OF THE CODE OF CIVIL PROCEDURE.  
25 DATED THIS 16TH DAY OF MAY 2018.

26   
27 \_\_\_\_\_, CSR #7416  
28 GAYE L. LIMON,  
OFFICIAL PRO TEMPORE REPORTER